

E

Atkinson-Baker Court Reporters
www.depo.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

- - -

CYNTHIA GUTIERREZ, JOSE HUERTA,)
SMH, RH and AH,)

Plaintiffs,)

vs.)

No. 4:16-cv-02645-DMR

SANTA ROSA MEMORIAL HOSPITAL,)
ST. JOSEPH HEALTH and DOES 1-50,)
inclusive,)

Defendants.)

DEPOSITION OF
STEWART LAUTERBACH, M.D.
SANTA ROSA, CALIFORNIA
MARCH 22, 2017

ATKINSON-BAKER, INC.
COURT REPORTERS
(800) 288-3376
www.depo.com

REPORTED BY: MICHELLE D. BARBANTE, CSR NO. 12601

FILE NO.: AB02108

Atkinson-Baker Court Reporters
www.depo.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

- - -

CYNTHIA GUTIERREZ, JOSE HUERTA,)
SMH, RH and AH,)

Plaintiffs,)

vs.)

No. 4:16-cv-02645-DMR

SANTA ROSA MEMORIAL HOSPITAL,)
ST. JOSEPH HEALTH and DOES 1-50,)
inclusive,)

Defendants.)

Deposition of STEWART LAUTERBACH, M.D., taken on
behalf of Defendants, at 131-A Stony Circle, Suite 500,
Santa Rosa, California, commencing at 8:19 a.m.,
Wednesday, March 22, 2017, before Michelle D. Barbante,
CSR No. 12601.

Atkinson-Baker Court Reporters
www.depo.com

A P P E A R A N C E S :

FOR PLAINTIFFS:

LAW OFFICE OF DOUGLAS C. FLADSETH
BY: DOUGLAS C. FLADSETH, ESQ.
1160 North Dutton Avenue
Suite 180
Santa Rosa, California 95401

FOR DEFENDANTS:

LaFOLLETTE, JOHNSON, DeHAAS, FESLER & AMES
BY: BRETT SCHOEL, ESQ.
655 University Avenue
Suite 119
Sacramento, California 95825

FOR STEWART LAUTERBACH, M.D.:

DONNELLY NELSON DEPOLO & MURRAY
BY: JAMES M. NELSON, ESQ.
201 North Civic Drive
Suite 239
Walnut Creek, California 94596

Atkinson-Baker Court Reporters
www.depo.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS: STEWART LAUTERBACH, M.D.

EXAMINATION	PAGE
By Mr. Schoel	5, 56
By Mr. Fladseth	48, 58

EXHIBITS

LETTER	DEFENDANTS' DESCRIPTION	PAGE
A-	Santa Rosa Memorial Hospital ED Summary Report for 09/09/14 Bate-stamped SRMH0567 to SRMH0585	9
B-	Emergency Department Report dated 2/25/15 with Addendum 02/26/15	17

NUMBER	PLAINTIFF'S DESCRIPTION	PAGE
	(NONE)	

QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:

(NONE)

INFORMATION TO BE SUPPLIED:

(NONE)

Atkinson-Baker Court Reporters
www.depo.com

1 to maximize corporate profits at the risk of patient
2 safety?

3 A. Never.

4 MR. SCHOEL: Okay. I have no more questions.
5 Thank you, Doctor.

6 MR. NELSON: Mr. Fladseth.

7 EXAMINATION

8 BY MR. FLADSETH:

9 Q. All right. Good morning, Dr. Lauterbach.
10 Obviously you're not a defendant in the case, certainly at
11 this point, and I did not notice you --

12 MR. NELSON: That is an implied threat, so be
13 very careful.

14 THE WITNESS: I heard that.

15 BY MR. FLADSETH:

16 Q. Well, anyway, I did not notice your deposition,
17 so I am going to set forth a couple of objections on the
18 record on that basis. That apparently Mr. Schoel advised
19 me right before the start of the deposition that he was
20 not able to find your addendum record, which is part of
21 Exhibit 2 to your deposition, in the hospital records, and
22 he was asking whether I even had that as part of the
23 records that he'd been produced. And of course, I'm going
24 to have to check with my consultants. And apparently
25 there's thousands of pages of records, so obviously,